



Attorney or Party Name, Address, Telephone & FAX Nos., State Bar No. & Email Address BRYAN CAVE LEIGHTON PAISNER LLP Sharon Z. Weiss (SBN 169446) Olivia J. Scott (SBN 329725) sharon.weiss@bclplaw.com olivia.scott3@bclplaw.com 120 Broadway, Ste 300 Santa Monica, California 90401-2386 Telephone: +1 310 576 2276 Facsimile: +1 310 260 7176 <i>Attorney for:</i> Treetop Development, LLC	FOR COURT USE ONLY
UNITED STATES BANKRUPTCY COURT CENTRAL DISTRICT OF CALIFORNIA - LOS ANGELES DIVISION 	
In re: Treetop Development, LLC	CASE NO.: 2:22-bk-14165 CHAPTER: 11 
Debtor(s).	STATEMENT OF DISINTERESTEDNESS FOR EMPLOYMENT OF PROFESSIONAL PERSON UNDER FRBP 2014 (File with Application for Employment)
	[No Hearing Required]

1. Name, address and telephone number of the professional (Professional) submitting this Statement:
Sharon Z. Weiss,
120 Broadway, Ste 300
Santa Monica, California 90401-2386
Telephone: +1 310 576 2276
2. The services to be rendered by the Professional in this case are (*specify*):
General bankruptcy and restructuring counsel to Debtor-in-Possession. See Retention Application.
3. The terms and source of the proposed compensation and reimbursement of the Professional are (*specify*):
Bryan Cave Leighton Paisner LLP ("BCLP") received a retainer payment from Debtor of \$300,000. All payment of fees and reimbursement of expenses shall be pursuant to professional fee statements and monthly/interim and final fee applications in accordance with the applicable federal and local rules and Bankruptcy Code. Payment shall be made by the bankruptcy estate and/or as provided by any debtor-in-possession financing.

4. The nature and terms of retainer (i.e., nonrefundable versus an advance against fees) held by the Professional are *(specify)*:
BCLP received its deposit retainer from non-debtor Atrium Building, LLC. BCLP has been authorized to draw upon the retainer upon approval of its fees and expenses, subject to payment and allowance procedures. Details with respect to the retainer are additionally set out in the Retention Application.
5. The investigation of disinterestedness made by the Professional prior to submitting this Statement consisted of *(specify)*:
BCLP has conducted a thorough, standard review for conflicts with Debtor; Debtor's management and member and its indirect beneficial owner; each of the non-debtor parties identified in Debtor's Schedules of Assets and Liabilities, including its secured and unsecured creditors, parties to executory contracts, unexpired leases and litigation.
6. The following is a complete description of all of the Professional's connections with the Debtor, principals of the Debtor, insiders, the Debtor's creditors, any other party or parties in interest, and their respective attorneys and accountants, the United States trustee, or any person employed in the office of the United States trustee *(specify, attaching extra pages as necessary)*:
See attached disclosure.
7. The Professional is not a creditor, an equity security holder or an insider of the Debtor, except as follows *(specify, attaching extra pages as necessary)*:
Not applicable. BCLP is not a creditor, equity security holder or an insider of Debtor.
8. The Professional is not and was not, within 2 years before the date of the filing of the petition, a director, officer or employee of the Debtor.
9. The Professional does not have an interest materially adverse to the interest of the estate or of any class of creditors or equity security holders, by reason of any direct or indirect relationship to, connection with, or interest in, the Debtor, or for any other reason, except as follows *(specify, attaching extra pages as necessary)*:
Not applicable, subject to the attached disclosure.
10. Name, address and telephone number of the person signing this Statement on behalf of the Professional and the relationship of such person to the Professional *(specify)*:
Sharon Z. Weiss,
120 Broadway, Ste 300
Santa Monica, California 90401-2386
Telephone: +1 310 576 2276
Email: sharon.weiss@bclplaw.com

11. The Professional is not a relative or employee of the United States trustee or a bankruptcy judge, except as follows
(specify, attaching extra pages as necessary):
Not applicable.

12. Total number of attached pages of supporting documentation: 4

13. After conducting or supervising the investigation described in paragraph 5 above, I declare under penalty of perjury under the laws of the United States, that the foregoing is true and correct except that I declare that paragraphs 6 through 9 are stated on information and belief.

I declare under penalty of perjury under the laws of the United States that the foregoing is true and correct.

10/28/2022
Date

Sharon Z. Weiss, Esq.
Printed Name

/s/ Sharon Z. Weiss
Signature

BRYAN CAVE LEIGHTON PAISNER LLP

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[Proposed] Attorneys for Debtor in Possession

UNITED STATES BANKRUPTCY COURT

CENTRAL DISTRICT OF CALIFORNIA

LOS ANGELES DIVISION

In re

Treetop Development, LLC,

Debtor.

Case No. 2:22-bk-14165

Chapter 11

**ATTACHMENT TO STATEMENT OF
DISINTERESTEDNESS FOR
EMPLOYMENT OF PROFESSIONAL
PERSON UNDER FRBP 2016**

Bryan Cave Leighton Paisner LLP (“BCLP”), proposed substitute general bankruptcy and restructuring counsel the above-captioned debtor and debtor-in-possession, provides the attached information in supplement to its *Statement of Disinterestedness for Employment of Professional Person Under FRBP 2016* (“**Statement**”) and the *Application of the Debtor for Entry of an Order Authorizing Retention and Employment of BCLP as Substitute Counsel for the Debtor and Debtor-In-Possession Pursuant to 11 U.S.C. § 327 Effective as of October 7, 2022* (“**Application**”):

Additional information in response to Statement No. 5: A complete list of the parties against which BCLP ran through its conflicts check process is annexed hereto as Schedule 5.

Additional information in response to Statement Nos. 6 and 9: A complete list of
BCLP's connections to parties having an interest in this case, together with the resolution of any
issues relating thereto, is annexed hereto as Schedule 6.

Schedule 5

List of Parties Included in BCLP's Conflicts Search

Debtor

Treetop Development, LLC

Debtor-affiliates:

Mohamed A. Hadid
Casablanca Grand, LLC

Secured Creditors:

Skylark Capital Management, LLC
Los Angeles County Tax Collector
Lydda Lud Lender Tree, LLC
PNC Equipment Finance, LLC

***Counterparties to Leases and Contracts
(omitted if already listed):***

Kazemi & Assoc.

Adverse litigation parties:

Arrow Tools Fasteners & Saw Inc.

Other involved:

Zach Vella
J. Michael Issa
Justin Cozart
Tree Lane LLC
Lewis R. Landau
Atrium Building, LLC
Mahmoud Hadid

Unsecured Creditors:

901 Strada, LLC
Abdulaziz Grossbart & Rudman
Bellis Steel Inc.
City of Los Angeles Fire Dept.
Cruz Concrete
David H. Lau & Associates, Inc.
Dexore Corp
Golden Blue Builders Group
HD Supply Construction White Cap LP
Heidi Cop d/b/a Donald J. Scheffler's
Concrete Construction
LADWP
LC Engineering
Leon Kraus Drilling
MAS Concrete Construction
Melt de la Paz, Inc.
National Ready Mix Concrete
NCL Electric
Pacific Growth Investments
Payan Surveying
RAL Design and Mgmt
Richard Weiss Law Office
Rodrigues and Rodriguez
Rosenthal Inspections
So Cal Industries
Sunwest Clean-up Inc.
Waterproofing and Roofing Solutions Inc.
Willscot
HD Supply Construction Supply Ltd.
CalWest Geotechnical Consulting

Schedule 6

BCLP's Connections to Interested Parties

<u>Party</u>	<u>BCLP's Connection and Resolution</u>
Mohamed A. Hadid	BCLP does not have any direct connection to Mr. Hadid. However, the firm represents Douglas Wilson and The Douglas Wilson Companies (collectively " <u>Douglas Wilson</u> ") as court-appointed receiver over the real property located at 901 Strada Vecchia, Los Angeles, CA 90077, in connection with <i>Bedrosian v. Hadid</i> , Case No. SC129388 (the " <u>Strada Vecchia Receivership Matter</u> "). The debtor is not a party to the Strada Vecchia Receivership Matter. BCLP obtained a waiver from Mr. Hadid that provides that BCLP may continue to represent Douglas Wilson in the Strada Vecchia Receivership Matter. Mr. Wilson also provided a waiver on behalf of the Douglas Wilson Company.
Atrium Building, LLC Mahmoud Hadid	BCLP received payment of its post-petition deposit from Atrium Building LLC, which is controlled by Mahmoud Hadid. Neither Atrium nor Mr. Hadid are parties to this proceeding and are not creditors of the debtor. Atrium acknowledged in writing 1) the Deposit is a gift, and not a loan, to the Treetop bankruptcy estate and any refund of the Deposit will be paid to Treetop or its successor, and, 2) that our client is the Debtor and not Atrium. BCLP will only take instructions from the Debtor and not Atrium. BCLP will only represent the Debtor's interests.
PNC Equipment Finance, LLC	BCLP represents PNC Equipment Finance or certain of its affiliates in unrelated matters. In an abundance of caution, in the event of adversity with PNC Equipment Finance, BCLP will defer such matter to conflicts counsel.